



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 15, 2021

Time to respond extended to June 28, 2021. Conference
adjourned from May 24, 2021 to July 15, 2021 at 2:00 p.m.
SO ORDERED.

Dated: 4/15/2021

P. Kevin Castel
United States District Judge

VIA ECF

Hon. P. Kevin Castel
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Zhu v. Renaud, et al.*, No. 21 Civ. 1598 (PKC)

Dear Judge Castel:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Application to Register Permanent Residence or to Adjust Status (Form I-485) and Refugee/Asylee Relative Petitions (Forms I-730). On behalf of the government, I write respectfully to request an on-consent extension of time of sixty days to respond to the complaint (*i.e.*, from April 29, 2021, to June 28, 2021). I also respectfully request that the initial conference presently scheduled for May 24, 2021, be adjourned to July 6, 2021, or thereafter.

The extension and adjournment are respectfully requested because USCIS has scheduled interviews regarding the Form I-485 and Form I-730 for the individuals present in the United States for April 28, 2021. The government anticipates that the requested extension will provide adequate time for USCIS to determine what next steps may be necessary in light of the April 28 interviews and also with respect to the Form I-730 for the overseas beneficiary, or to proceed to take adjudicative action, which potentially could render this action moot. This is the government’s first request for an extension of the deadline to respond to the complaint and to adjourn the initial conference. Plaintiff’s counsel consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

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cc: Counsel of record (via ECF)